



U.S. Department of Justice

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July 22, 2020

Steve Greenberg  
53 West Jackson  
Suite 1260  
Chicago, Illinois 60604

Re: ***United States v. Robert Sylvester Kelly, No. 19 CR 567***

Dear Mr. Greenberg:

Per your request in your letter dated July 20, 2020, we will ask counsel for Derrel McDavid and Milton Brown to return Disc 49 to be replaced with a disc that does not contain the attorney bank records. We will notify you when that is complete.

As I stated in our phone conversation, the government subpoenaed various bank accounts for recipients of funds from the SomeBrotherLuv bank account to show that Mr. Kelly, and not Mr. Calbert, controlled the funds in that account and that the assignment of certain royalties from Mr. Kelly to Mr. Calbert was not an arms-length transaction and that Mr. Kelly retained control of those funds despite the assignment of royalties.

Regarding your remaining requests, we are unaware of any statute, rule, or case law that requires a response. If you disagree, please provide us with such authority.

Very truly yours,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Angel M. Krull  
Angel M. Krull  
Assistant United States Attorney